

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**REX VENTURES GROUP, LLC d/b/a  
ZEEKREWARDS.COM, and PAUL  
BURKS,**

**Defendants.**

**Civil Action No. 3:12-cv-519**

**NOTICE OF WITHDRAWAL OF RECEIVER’S MOTION (Doc. 330) FOR ORDER  
DIRECTING BBVA COMPASS TO TURNOVER ESTATE ASSETS AND  
ALTERNATIVE MOTION FOR ORDER DIRECTING BBVA COMPASS TO APPEAR  
AND SHOW CAUSE WHY IT SHOULD NOT BE HELD IN CONTEMPT FOR  
VIOLATION OF FREEZE ORDER**

Kenneth D. Bell, Court-appointed Receiver (the “Receiver”) of Rex Venture Group, LLC d/b/a ZeekRewards.com, through counsel, hereby withdraws the Receiver’s Motion for Order Directing BBVA Compass to Turnover Estate Assets and Alternative Motion for Order Directing BBVA Compass to Appear and Show Cause Why it Should not be Held in Contempt for Violation of Freeze Order, filed February 5, 2015 as Document 330.

The motion (Doc. 330) is withdrawn pursuant to an agreement between the Receiver and BBVA Compass.

This the 14<sup>th</sup> day of July, 2015.

/s/ Joseph W. Moss, Jr.

Joseph W. Moss, Jr.

N.C. Bar No. 20236

Matthew M. Holtgrewe

N.C. Bar No. 42912

Erwin Bishop Capitano & Moss, P.A.

4521 Sharon Road, Suite 350

Charlotte, N.C. 28211

Email: [jmoss@ebcmlaw.com](mailto:jmoss@ebcmlaw.com)

[mholtgrewe@ebcmlaw.com](mailto:mholtgrewe@ebcmlaw.com)

Telephone: (704) 716-1200

Facsimile: (704) 716-1201

Attorneys for KENNETH D. BELL, in his capacity as court-appointed Receiver for Rex Venture Group, LLC d/b/a ZeekRewards.com

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing motion was filed using the CM/ECF system which will send electronic copies to counsel of record registered to receive electronic service.

This the 14th day of July, 2015.

/s/Joseph W. Moss, Jr.  
Joseph W. Moss, Jr.